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*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CARLOS VALENCIA and GLORIA N. BONILLA,

Plaintiffs,

-against-

100 CHURCH, LLC, AMBIENT GROUP, INC.,  
BANKERS TRUST COMPANY, BATTERY PARK  
CITY AUTHORITY, BT PRIVATE CLIENTS CORP.,  
CUNNINGHAM DUCT CLEANING CO., INC.,  
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE  
BANK TRUST COMPANY AMERICAS, DEUTSCHE  
BANK TRUST CORPORATION, EMPIRE STATE  
PROPERTIES, INC., GPS ENVIRONMENTAL  
CONSULTANTS, INC., HUDSON TOWERS HOUSING  
CO., INC., INDOOR AIR PROFESSIONALS, INC.,  
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,  
LAW ENGINEERING P.C., LEFRAK  
ORGANIZATION, INC., MERRILL LYNCH & CO,  
INC., ONE WALL STREET HOLDINGS, LLC.,  
ROYAL AND SUNALLIANCE INSURANCE GROUP,  
PLC, THE BANK OF NEW YORK COMPANY, INC.,  
THE BANK OF NEW YORK TRUST COMPANY NA,  
TISHMAN INTERIORS CORPORATION, TRC  
ENGINEERS, INC., TULLY CONSTRUCTION CO.,  
INC., TULLY INDUSTRIES, INC. and ZAR REALTY  
MANAGEMENT CORP.,

Case No.:  
07-CV-5324 (AKH)

**AMENDED NOTICE OF  
ADOPTION OF ANSWER  
TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Amended Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint Adding New Defendants Not Previously Served filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

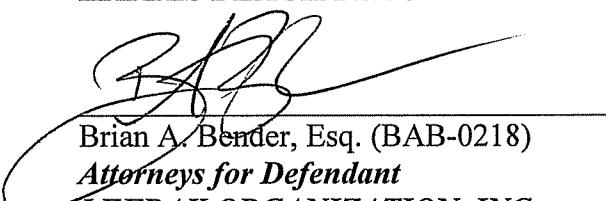
**PLEASE TAKE FURTHER NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., reserves its right to assert any defenses to which it is entitled, including, but not limited to those enumerated in Case Management Order No. 4 (¶¶D(1)-(5)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
December 31, 2007

Yours, etc.,

**HARRIS BEACH PLLC**

  
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